

EXHIBIT LL

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF EDWARD JOSEPH PRINCE

I, Edward Joseph Prince, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached, as Exhibit A to this Declaration, is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. At the time of these attacks, I was employed as a firefighter at the New York Fire Department. I worked at Firehouse E241 on Ladder 109, located at 3rd Ave in Brooklyn, New York.

4. On the morning of September 11, 2001, I was stationed at Firehouse E241. After the first plane plunged into One World Trade Center, our station received an alert about a plane accident. At the time of the initial alert, we believed that the initial plane collision was merely an accident. I immediately called my wife, Wanda Prince, who worked in Two World Trade Center on the 91st floor. During our call, my wife described a horrific scene at the World Trade Center Towers. I could hear the fear and terror in my wife's voice as she described to me that people

were jumping out of the One World Trade Center building to their deaths due to the fire and destruction caused by the airplane's impact with the building. I told her to evacuate Two World Trade Center immediately. After the second plane plunged into Two World Trade Center, we knew definitively that this was not an accident but a terrorist attack at the World Trade Center. At that point, every available fire fighter unit was called to lower Manhattan, including Ladder 109.

5. When we reached the World Trade Center area, Tower Two began to collapse. The scene was apocalyptic: there was smoke, concrete dust, steel, and debris everywhere. At that point, we became involved with a search and rescue mission. I tried calling my wife several times to make sure that she had been able to escape the building, but her phone went to voicemail. The scene was incredibly chaotic, and people were running towards us as our firefighting team made our way towards what was left of Tower Two. As the debris from the 'Tower Two collapse had cascaded around the World Trade Center area, my fellow firefighters and I scrambled to save people who had been injured with falling debris. In the course of frantically moving heavy debris to save lives, I significantly injured my back and neck. I also inhaled and consumed large levels of smoke, dust, and debris during this time frame.

6. I continued to search Ground Zero for almost two full days after the terrorist attacks in desperate hope of locating my missing wife. I checked all of the local hospitals and I put up fliers in an effort to locate my beloved wife.

7. After I searched endlessly for my wife for several weeks at Ground Zero and numerous other locations, I finally received a call from the New York Health Department on October 1, 2001, with terrible news. They had identified a part of my wife's hand, confirming that she had perished on 9/11. I was devastated when I received this horrible news.

8. After taking a few weeks leave from the New York Fire Department due to the trauma that I had experienced related to the 9/11 attacks and the loss of my wife, I finally returned to Ground Zero to continue to assist with searching for the bodies and body parts of those 9/11 terror victims who were missing or presumed dead.

9. As a result of these terrorist attacks, I suffered the following specific injury(ies) on September 11, 2001: bulging discs in my neck and lower back, nerve damage in my neck, a shoulder injury, chronic sinusitis, rhinosinusitis, GERD, persistent headaches, a deviated nasal septum, and laryngopharyngitis. I also later developed a 9/11-related cancer in my right *eye* as described below.

10. I sought medical attention for my injuries following the events of 9/11, and I continue to receive treatment for these various injuries. I have received regular and periodic nerve block injections for my bulging discs in my neck and lower back, and my sinusitis has been treated for many years with several medications, including antibiotics, steroids, nasal sprays, and allergy medications.

11. In 2015, my doctors discovered that I had developed a 9/11-related cancer behind the optic nerve of my right eye (medically referred to as a malignant neoplasm of the right eye). Due to the sensitive location of the cancer, my doctors considered the growth to be inoperable. Accordingly, I received powerful doses of radiation for a six week period to shrink the cancer. While these treatments successfully reduced the cancer behind my optic nerve, I lost my vision in my right eye as a result of the treatments.

12. I suffered, and continue to suffer, severe emotional distress because of the above terrorist attacks. Due to the horrific events that I witnessed on 9/11 and the loss of my beloved wife, I suffered and continue to suffer from PTSD, anxiety, a sleeping disorder, and an extreme

sensitivity to sounds such as ambulances or police sirens. As noted in my attached medical records, I continue to receive psychiatric care for my PTSD, anxiety, and depression.

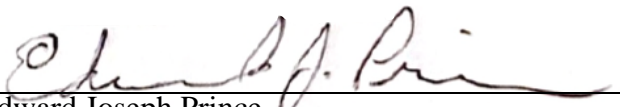
13. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to my physical and psychological injuries that I suffered as a result of the September 11, 2001 terrorist attacks.

14. Due to my injuries suffered on 9/11, including my vision loss secondary to my right eye malignant neoplasm and my chronic sinusitis, I was forced to retire from my job as a Lieutenant in the New York City Fire Department in 2016. Attached as Exhibit C to this Declaration are true and correct copies of the New York Fire Department Medical Board's Recommendations and my Award of Accident Disability Retirement letter.

15. I previously pursued a claim through the September 11th Victim Compensation Fund (Claim Number 110754) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 28th day of September 2020.


Edward Joseph Prince

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**